

III. REMARKS

1. Claims 1 and 7 are amended to address the 35 U.S.C. §112 rejections as suggested by the Examiner.
2. Claims 1-10 are not unpatentable over Hannu et al. ("Hannu") in view of Chuah under 35 U.S.C. §103(a).

Claim 1 recites allowing a user of the terminal to update the parameters specifying the compression methods of the terminal in the terminal. This is not disclosed or suggested by the combination of Hannu and Chuah.

Claim 1 is directed to configuring a compression method. The use of the compression method on simultaneous radio bearers is configured on the basis of the characteristic parameters transmitted by the terminal. The user can update the parameters specifying the compression methods of the terminal. The combination of Hannu and Chuah does not disclose or suggest at least these features.

Hannu is directed to increasing the efficiency and robustness of the compression of a communication protocol for communication between entities over bandwidth limited communication links. Hannu uses the request-reply nature of communication protocols to update compression and decompression dictionaries. (see e.g. Abstract). This is not the same as "configuring" the compression methods on the basis of "characteristic parameters" transmitted by the terminal as claimed by Applicant. Hannu does not discuss or describe allowing the user to control characteristic parameters of the terminal. Characteristic parameters of the terminal are generally declarations to the network of the terminal's capabilities. Item 110 of Figure 1 of Hannu is merely the mobile terminal. Hannu merely references compression methods and the need to increase the efficiency of "dictionary compression methods." [0018] . Figures 1 and 2 illustrate entities communicating with each other using a communication link in which a

dictionary compression method is used [0028]. The compressor 215 and the decompressor 225 used the shared dictionary for the compression and decompression of messages [0029]. There is no disclosure here or elsewhere in Hannu related to "**configuring**" at least one compression method on the basis of the "characteristics parameters" "**transmitted**" by the terminal as recited in Applicant's claims. Hannu only "updates" compression dictionaries during the communication session [0030]. This is not what is claimed by Applicant where the "compression method" is **configured** based on the characteristic parameters "transmitted" by the terminal. Thus, at least this feature claimed by Applicant is not disclosed or suggested by Hannu.

The combination of Hannu with Chuah also does not disclose or suggest "configuring at least one of the compression methods in the system on simultaneous radio bearers of the terminal" on the basis of the characteristics parameters "transmitted by the terminal" as recited in Applicant's claims.

First, there is no motivation to combine the references as proposed. In order to establish a *prima facie* case of obviousness under 35 U.S.C. §103(a), there must be some suggestion or motivation, either in the reference itself or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or combine reference teachings. There must also be a reasonable expectation of success, and the reference(s), when combined, must teach or suggest all of the claim limitations. (See M.P.E.P. §2142). Hannu deals with updating compression dictionaries. (see e.g. [0030].) Chuah is directed to compression of a GTP/UDP/IP header to more efficiently transport small multimedia RTP packets. There is no teaching to be found in either reference that would motivate one of skill in the art to combine updating compression dictionaries with compression of a GTP/UDP/IP header to more efficiently transport small multimedia RTP packets to achieve what is recited by Applicant in the claims.

Additionally, motivation for purposes of 35 U.S.C. §103(a) requires that the reference itself and/or the knowledge generally available to one of skill in the art provide the requisite motivation or suggestion to modify the reference. When "the PTO asserts that there is an explicit or implicit teaching or suggestion in the prior art, it must indicate where any teaching or suggestion appears in either reference." In re Rijckaert, 28 USPQ2d 1955, 1957 (Fed. Cir. 1993). The Examiner is requested to provide an indication as to where any such teaching, suggestion or motivation to combine updating compression dictionaries (Hannu) with compression of a GTP/UDP/IP header to more efficiently transport small multimedia RTP packets (Chuah) to achieve "configuring at least one of the compression methods in the system on simultaneous radio bearers of the terminal" on the basis of the characteristics parameters "transmitted by the terminal", as recited in Applicant's claims, appears in either reference. Absent such a teaching, it is submitted that a *prima facie* case of obviousness over Hannu and Chuah under 35 U.S.C. §103(a) is not established.

Second, each feature recited by Applicant in the claims is not disclosed or suggested by the combination of Hannu and Chuah. Neither Hannu nor Chuah disclose or suggest that the user can control any characteristic parameters. Chuah discusses s compression framework that provides for GTP header compression. (Col. 2, line 66 to Col. 3, line 13). The header compression can be "negotiated" independently between peers. (Col. 3, lines 15-20.) However, there is no disclosure in this or any portion of Chuah related to "allowing a user of the terminal to update the parameters specifying the compression methods of the terminal in the terminal" as claimed by Applicant. The Examiner appears to recite to the entire specification of Chuah (Cols. 3-10) as disclosing this feature. This position is respectfully traversed.

Furthermore, Applicant respectfully notes that Hannu and Chuah have been combined improperly. References may be combined under 35 U.S.C. §103(a) only if the references are analogous art. In this case Hannu and Chuah are not analogous art. A

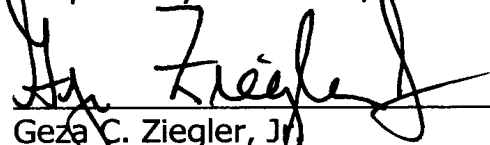
reference is analogous art if the reference is in the same field of endeavor as the applicant's, or the reference is reasonably pertinent to the particular problem with which the applicant was concerned. Hannu deals with updating compression dictionaries while Chuah is directed to compression of a GTP/UDP/IP header to more efficiently transport small multimedia RTP packets. Applicant's claims on the other hand are directed to configuring a plurality of compression methods in a terminal that includes "configuring at least one of the compression methods in the system on simultaneous radio bearers of the terminal" on the basis of the characteristics parameters "transmitted by the terminal". Thus, the references do not qualify an analogous art and cannot be combined for purposes of 35 U.S.C. §103(a).

Thus, claims 1 and 7 are allowable, as are the claims that depend therefrom.

It is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,



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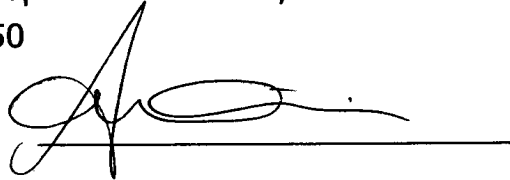
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